



**Co-Chairperson: Jim McKenna, Port of Portland**  
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**Treasurer: Fred Wolf, Legacy Site Services for Arkema**

May 27, 2008

Chip Humphrey  
Eric Blischke  
U.S. EPA  
805 SW Broadway, Suite 500  
Portland, OR 97205

**Re: May 19, 2008 Direction on Pacific Lamprey (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Dear Chip and Eric:

In your letter of May 19, 2008 you directed the Lower Willamette Group to assess Pacific lamprey at the individual organism level "as described in the February 15, 2008 Problem Formulation for the Portland Harbor Ecological Risk Assessment." Because the approach to such a risk assessment is not actually described in EPA's Problem Formulation document (other than the statement that it must be addressed on an individual level), we are currently working with our consultants to understand how an individual risk assessment might be performed with the existing data.

To that end, it would assist us if we could get further clarification as soon as possible from EPA as to what it intends that this risk assessment would entail. We believe it would be useful to have John Toll meet with EPA's team to walk through exactly what is intended.

Under the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study, the Lower Willamette Group would be required to invoke dispute resolution on this directive by June 2, 2008. Because we believe this issue may be resolved through clarification of EPA's directive, we respectfully request that the deadline for dispute resolution be extended until June 18.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim McKenna", with a stylized flourish at the end.

Jim McKenna  
LWG Co-Chair

A handwritten signature in blue ink, appearing to read "Bob Wyatt", with a stylized flourish at the end.

Bob Wyatt  
LWG Co-Chair

Cc: Lori Cora, EPA  
LWG Executive Committee